

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG TELECOMMUNICATIONS
AMERICA GENERAL, L.L.C.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

Plaintiffs,

v.

ON SEMICONDUCTOR CORP.

and

SEMICONDUCTOR COMPONENTS
INDUSTRIES, LLC,

Defendants.

Civil Action No. 06-CV-0720 (***)

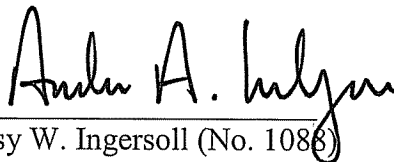
**PLAINTIFFS' MOTION TO ENJOIN DEFENDANTS
FROM PURSUING A DUPLICATIVE TEXAS ACTION**

Plaintiffs Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications America General, L.L.C., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C. hereby move this Court, pursuant to the first-filed rule, to enjoin Defendants ON Semiconductor Corp. and Semiconductor Components Industries, LLC from pursuing, prosecuting, or otherwise proceeding with a duplicative action filed by Defendants in the United States District Court for the Eastern District of Texas, Case. No. 6:06 cv 523. The

bases of this motion are fully set forth in Plaintiffs' opening brief and the supporting declaration of Patrick Muir, filed contemporaneously herewith.

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion to enjoin.

Respectfully submitted,



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L.L.C., Samsung Semiconductor, Inc., and
Samsung Austin Semiconductor, L.L.C.*

Dated: December 21, 2006

CERTIFICATE OF SERVICE

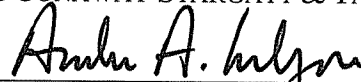
I, Andrew A. Lundgren, Esquire, hereby certify that on December 21, 2006, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF and served upon the defendants' registered agent as indicated below:

BY HAND DELIVERY

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